

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JASMINE BURGESS, on behalf of all other
similarly situated,

Plaintiff,

v.

MAJOR MODEL MANAGEMENT, INC. and
GUIDO DOLCI

Defendants.

CIVIL ACTION NO.:
1:20-CV-02816-GHW

NOTICE OF MOTION

PLEASE TAKE NOTICE, that upon the annexed Memorandum of Law dated April 16, 2021, Declaration of Scott Green, Esq. dated April 16, 2021, and the exhibits attached thereto, together with all prior proceedings had herein, defendants Major Model Management, Inc. and Guido Dolci will move this Court before the Honorable District Judge Gregory H. Woods at the Daniel Patrick Moynihan United States Courthouse located at 500 Pearl Street, New York, NY 10007, for an order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure dismissing with prejudice the first, second, third, fourth, fifth, sixth, seventh, tenth, eleventh, and twelfth causes of action in the Second Amended Class and Collective Action Complaint filed in this action by plaintiff Jasmine Burgess, individually and on behalf of all others similarly situated, and granting such further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to Rule 6 of the Federal Rules of Civil Procedure and Rule 6.1(b) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, opposition papers, if any, must be served within fourteen days of the filing of this motion; reply papers if any, must be served within seven days of service of opposition papers.

Dated: Garden City, New York
April 16, 2021

GOLDBERG SEGALLA LLP

By: \s\ Scott R. Green
Scott R. Green
200 Garden City Plaza, Suite 520
Garden City, New York 11530
Phone: (516) 281-9859
Fax: (516) 281-9801
Attorneys for Defendants
Major Model Management, Inc. and
Guido Dolci

To: All Counsel (via ECF)